

RECEIVED  
U.S. DISTRICT COURT E.D.N.Y.  
Dec 16 2024  
LONG ISLAND OFFICE

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

Patrick Guillory

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Surfpoint Recovery

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Complaint for Violation of Civil Rights

(Non-Prisoner Complaint)

24-cv-8711-AMD-LKE  
Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Jury Trial:  Yes  No  
(check one)

I'M SNITCHING!!

\*AND I DONT CARE if I get BEAT UP

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed *in forma pauperis*.

REC'D IN PRO SE OFFICE  
DEC 16 '24 PM3:05

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
★ DEC 16 2024 ★  
LONG ISLAND OFFICE

RECEIVED  
DEC 16 2024  
EDNY PRO SE OFFICE

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

PATRICK GUILLORY, Room 327 B  
Surfpoint Recovery Program  
2316 Surf Avenue  
Brooklyn, NY 11224  
(347) 727-4800 ext 549  
ext 540

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title

(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

(if known)

Surfpoint Recovery  
2316 Surf Avenue  
Brooklyn, NY 11224  
(347) 727-4800  
ext. 540  
549

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- State or local officials (a § 1983 claim)  
 Federal officials (a *Bivens* claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? (X) Discrimination

- 1.) Retaliation For Filing Grievances  
2.) Medicare FRAUD UPON the Government  
3.) Whistleblower, I'M SNITCHING AND I  
DONT CARE IF I get BEAT UP !!

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

See Attached Complain +  
I'M SNITCHING !!  
FRAUD UPON the Court

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Surfpoint Recovery  
2316 SURF Avenue  
Brooklyn, N.Y. 11224  
(347) 727-4800 exts 540, 549

- B. What date and approximate time did the events giving rise to your claim(s) occur?

NOVEMBER 15, 2024 to Date

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See Attached Verified  
Complaint.

I'm Snitching

Fraud upon the Court

**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

See Attached Verified  
COMPLAINT.  
I'M SNITCHING  
FRAUD UPON THE COURT

**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

See Attached  
Verified COMPLAINT.  
I'M SNITCHING  
FRAUD UPON THE COURT.

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing 12-9-, 2024

Signature of Plaintiff 

Printed Name of Plaintiff Patrick Guillory

United States District Court  
Eastern District of New York

PATRICK GUILLORY Case # \_\_\_\_\_

Plaintiff, Hon: \_\_\_\_\_

- VS -

SurgePoint Recovery  
Defendant

December 10, 2024

Verified Complaint

### I. Jurisdiction

1.) This court has jurisdiction over the Plaintiff and the Defendant on the ground that both reside within Kings County in Brooklyn, New York.

## II. Statement of FACTS

2.) ON NOVEMBER 15, 2024, I ARRIVED @ SURFPONT RECOVERY (HEREINAFTER, S.R.) TO OBTAIN TREATMENT FOR MY SUBSTANCE USE DISORDER, i.e. ALCOHOLISM.

3.) ON NOVEMBER 22, 2024 (OR SO) I FILED A GRIEVANCE AGAINST MY PRIMARY COUNSELOR, MS. JENNIFER REYNOLDS ON THE GROUNDS THAT SHE REPEATEDLY FAILED TO MAKE HER APPOINTMENTS WITH ME TO COMPLETE MY TREATMENT PLAN.

4.) ON NOVEMBER 23, 2024, I MET WITH JENNIFER IN HER OFFICE AND SHE WORKED ON MY TREATMENT PLAN FOR ABOUT 15 MINUTES. A TREATMENT PLAN TAKES 2 HOURS.

5.) SHORTLY THEREAFTER, I WENT TO A GRIEVANCE HEARING (SUPRA @ 3) TO ADDRESS JENNIFER'S CONDUCT. NOTE THAT PRIOR TO THE HEARING, MS. JENNIFER HAS BEEN INVESTIGATED BY N.Y.S. OFFICE OF ALCOHOL AND SUBSTANCE ABUSE SERVICES (OASAS) AND N.Y.S. JUSTICE

Center which governs Counselor's license to practice within New York State.

6.) The grievance committee advised me that my "CLAIMS were VALID" and my case and unfinished treatment plan would be transferred to the senior counselor, MR. Michel FOX.

7.) ON November 24, 2024, Jennifer suspended all my calls from my emergency contact list and refused to take calls from my family until my case was officially transferred to Michel FOX. My lawyer is on my emergency contact list also.

8.) On or about December 2<sup>nd</sup> 2024 I filed another grievance on the ground that my treatment plan was still not completed some 18 DAYS LATER. NOTE THAT, THIS IS A 28 DAY PROGRAM... I HAD ONLY 10 DAYS TO COMPLETE. TO DATE, WHILE MY GRIEVANCE IS CURRENTLY ON FILE... I HAVE NOT HAD A HEARING CONCERNING THE SAID GRIEVANCE

On the Ground from "Central Compliance"

"You CAN sign off on your Grievance when you are discharged."

My One process rights to engage in protected conduct is non-existent.

9.) On December 8, 2024, I filed another grievance on the grounds that "I've been here 24 DAYS AND ALET COKE (CLINICAL DIRECTOR) HAVE NOT SIGNED off on my Treatment PLAN." The CLINICAL DIRECTOR MUST SIGN off on a Treatment PLAN to make it VALID.

In retaliation for filing the grievance, the defendant started suspending all groups which I WAS NOT ALLOWED to attend... 7 DAYS A WEEK.

- i.e.
  - SMOKING CESSATIONS
  - MAKING AMENDS
  - BEYOND THE TEARS GRIEF GROUP
  - SELF CARE
  - MEN'S GROUP

- Sober Living
- Harmony In Healing

See Exhibit A

10.) SO I WAS LIKE SO WHAT ABOUT MY  
December 2<sup>nd</sup> AND December 8<sup>th</sup> 2024  
grievances ... will a hearing be held and  
disposition rendered ??

AGAIN... "WE WILL GET TO THAT POINT,  
WHEN YOU ARE DISCHARGED."

See Supra @ 8-9

With the above in mind, S.R. Grievance Committee is a Kangaroo Court that HAS VIOLATED MY ONE PROCESS RIGHTS TO ENGAGE IN PROTECTED CONDUCT WITHOUT RETALIATION. NOR DOES THE GRIEVANCE PROCESS ALLOW FOR AN APPEAL.

11.) Let's revisit the fraud upon the court via a very true example from U.S. District Court, Eastern District of New York.

Help Your Honor... the Chief Judge of the Eastern District HAVE A FEW DRUG CASES BEFORE THE COURT.



12.) As of the week of December 8th of 2024:

7 Days a week staff did not show up to facilitate Group Meetings.

X 50 Clients were not allowed to get the help that we need.

= 350 False Claims to Medicare in one week.

AMX said during the meetings  
... "I will be calling Billing."  
Too late for that... you busted

13.) On December 9, 2024, @ 10:30 AM the above said meeting took place with AMX (S.R. Central Compliance Representative from Albany) and M.S. Chelright (S.R. Chief Operating Officer) whereby AMX admitted that S.R. staff did not facilitate the meetings mentioned ... seven (7) days a week.

See Supra # 9 and Exhibit A

on the grounds that: "ERRORS ARE MADE"



16.) To the Point, S.R. STAFF ... AND OASAS. Are printing out Program schedules whereby STAFF DO NOT even show up to FACILITATE the PROGRAMS ... 7 DAYS A WEEK.

### III. Let's Make a Deal

17.) I Respectfully ask the Court to demand of the Defendant the sign-in sheets from your Federal Angle Bracelet inmates here @ S.R (or myself) for just the seven classes mentioned in the 12-8-2024 Grievance for the month of December.

MON - SMOKING CESSATIONS  
TUE - MALAR AMENDS  
WED - BEYOND THE TEARS  
THUR - SELF CARE  
FRI - MEN'S GROUP  
SAT - SOBER LIVING  
SUN - HARMONY IN RECOVERY

See Exhibit A

18.) IMPOSSIBLE, THE COURT HAS BEEN BAMBOOZLED.

19.) IMPOSSIBLE, THE U.S. ATTORNEY'S OFFICE HAS BEEN PRANKED.

20.) IMPOSSIBLE, THE U.S. PROBATION DEPARTMENT HAS BEEN SUCKERED.

21.) IN FACT, I'M SO COMFORTABLE IN MY POSITION THE DEAL IS:

If the court can produce the sign-in sheets, showing that groups were, in fact, held ...)

I consent to having the court issue an order to the U.S. MARSHAL'S OFFICE FOR MY ARREST. I'll DO seven DAYS @ MDC w/o ISSUE.

22.) But that will never happen

Because it's not me who is

Being Bamboozled, Pranked, And Suckered.

23.) IT'S the Honorable Court's...  
for believing ANY AND every  
Document sent from the Defendant  
which is flat of FACTS on  
the DECISION OF CHAMBERS faxed  
from Surf Point's Fraudulent  
PROGRAMS of FICTION.

Not only is the Defendant  
Getting Rich off of the  
Court's IGNORANCE, the Court  
IS ACTUALLY USING the  
Defendant's Fraudulent PROGRAM  
SCHEDUAL ... LIKEn TO A  
"Pre-Sentence INVESTIGATION REPORT."<sup>11</sup>  
Thus, the Court is USING  
Fraudulent DOCUMENTS from the  
Defendant AND CONVERTING the  
SAME INTO SUBSEQUENT JUDICIAL  
MANDATES. To the point, IT'S FRAUD  
UPON the Court .... LEADING TO FRAUD  
WITHIN the Court's RULINGS.

## II. DISCRIMINATION

24.) The Defendant HAS A White  
ONLY NO JEWS ALLOWED,  
BLACKS TO THE BACK of the  
THIS DISCRIMINATION POLICY  
@ the point of Admissions.  
Let's TAKE A LOOK:

25.) 99% of white clients get sent to white counselors.

99% of black clients get sent to black counselors.

99% of Hispanics get sent to black counselors

26.) When I objected to such racist procedures ....,

AMY (Central Compliance from Albany) stated "...," "Well some clients feel more comfortable speaking with someone from their own culture."

\* Every white person here speaks English!! ESP. when its time to eat!

\* What a Disrespectful answer.

27.) For example, MY Bunker ...  
He is white ... talk about a  
cool white boy. We talk all night.

→ In any event, MY Bunker (327-A)  
... I'm (327-B). He got here 3  
DAYS after me ... But his  
white privilege gets him ~~all type of~~ All type of Goodies

→ Whites get their Treatment  
PIANS DONE within 7 DAYS.  
BLACKS AND JEWS (like me) MUST  
WAIT 3 weeks... When it's time to leave  
(28 DAY program)

→ MY White Bunker sleeps in bed  
ALL DAY AND MAY HAVE ATTENDED  
20 GROUPS. I'M BLACK AND JEWISH  
... I ATTENDED OVER 100 GROUPS ...  
GUESS WHAT ... S.R. BANG ON BLACKS  
DOORS ORDERING THEM TO COME TO  
GROUPS.

\* Check this out! If you don't come  
to group (being black or Jewish)  
you MUST sign a "Group  
Refusal Form."

28.) Not if you are white...  
the Refusal FORMS ARE ONLY  
FOR BLACKS AND JEWS.

The Court will Be HARD Pressed  
to see my white BUNKY NAME  
ON ANY Refusal FORM. I should  
KNOW.  
... He sleeping !!!

29.) Whites get Referred to Long  
TERM Treatment Centers in:

Long Island  
State Island  
and  
the HAMPTONS

Blacks and Jews get sent

to: 125<sup>st</sup> CHARLEM  
98<sup>st</sup> BROOKLYN

and  
anywhere in the BRONX

30.) White Clients get Help with:

- Food Stamp Applications
- Cash Assistance Applications
- Basic HRA Information

Blacks and Jews Get:

"A 2024 'Guide to Benefits' HandBook... the one you get when you get released from Riker's Island."

31.) Counselor Anna, who is White, is a great counselor. She supports her White clients. Meaning,

White Counselors spend 2 hours when counseling White clients.

Black Counselors spend 15 minutes to 20 minutes with black clients.

It's all on camera which should be allowed "in-camera review" under the Federal Rules of Civil Procedure.

32.) BLACKS don't get the Glee of White Power." I Admit that I'm powerless over Alcohol and my life HAS become UNMANAGEABLE. God Grant me the Serenity to accept the things I CANNOT change.

I'll Just remember what AMY (Central Compliance from Albany) Stated:

"Well some clients feel more comfortable speaking with someone from their own culture."

AKA ... White Privilege

## I. Relief Sought

- 1.) \$500,000 in ACTUAL AND COMPENSATORY DAMAGES.
- 2.) \$500,000 in PUNITIVE DAMAGES.
- 3.) \$500,000 in EMOTIONAL DISTRESS.

4.) An order from the Court  
Directed to the Defendant to  
ascertain as to why..., while  
Counselor Anna spends 2 to  
3 hours (each session) with  
white clients..., while

black counselors spend 15  
minutes with Negro Jews!

Verification

Patrick Guillory

I, Patrick Guillory, certify that the above  
statements are true and correct to the best  
of my belief under perjury of the 18 U.S.  
Code. And, MY OWN EYEBALLS!!

(MY SISTER)

SURPOINT

RECOVERY

\* Been here 24 DAY<sup>s</sup> TOTAL AND Alet coke  
still HAVE NOT signed off on MY treatment plan.

**Surpoint Recovery & Wellness Services**

Grievance Form

Date of Complaint:

12-8-24

Patient Name:

PATRICK GUILORY

\* FRAUDulent PROGRAM Schedual VIA OASAS.

Description of Complaint:

Medicare Fraud. Surpoint is Billing Medicare for services not provided.

- Mon - Smoking cessation - ?
- Tue - Making Amend's - Henry
- wed - Beyond the Years - Anna
- Thu - Self care - Kim
- Fri - Mon's Group - Sylvester
- SAT - Sober living - Monette
- Sun - HARMONY in Health - Blutte

$$\times 4 = 28 \\ \text{Groups}$$

\* You can't Bill for  
\* IT's called Medicare Fraud.

What Action Would You Like Taken?

Since Surpoint wants to retaliate on me for filing grievances... "Denying me services" Surpoint can explain this in an "Answer" to a Federal Lawsuit. ~~if it continues~~  
Bucket List: I would use the U.S. Attorney Office, N.Y.G. Office of the Attorney General, OASAS & the Justice Center to conduct an Audit.

Investigation Results and Corrective Action: (Facility Action)

YOU GUYS ARE TRYING TO SEND ME TO A SHELTER  
NOT HAPPENING.

Exhibit A

Exhibit I

End  
16

To: C.O.O. Cherish @ SPR.

To: Alex Oke @ S.P.R.

To: Michel Fox @ S.P.R.

From: Patrick Gaillory

Date: 12/9/24

Subject: Confirmation to  
the complaint filed w/  
the Justice Center.

---

10123800280690

Issues: ① Medicare Fraud

② Retaliation for

Exhibit 1 Filing Grievances

③ Trying to send me

to a Homeless Shelter

AKA Crisis Center,,,

# Federal Released inmates Might AS Well

|                   | SUNDAY                                   | MONDAY                                    | TUESDAY   | WEDNESDAY                            | THURSDAY                    | FRIDAY  | SATURDAY   |
|-------------------|--|---|---|--------------------------------------|-----------------------------|---|--|
| 10:00 AM -10:30AM |  | COMMUNITY MEETING OPERATIONS              |   | COMMUNITY MEETING OPERATIONS         |                             | ACCLIMATING TO RECOVERY MICHAEL               | COMMUNITY MEETING OPERATIONS                         |
| 10:45AM -11:30AM  | HARMONY IN HEALING G1 KLONETTE G2 ISABEL | SMOKING CESSATION G1 RAYMOND G2 ISABEL    | CONNECTIONS IN RECOVERY G1 JAMILIX G2 PRISCILLA | HEALING BONDS G1 KIMA G2 JAMILIX     | LIFT SKILLS JHONNY O        | GRIEF TO GOWTH G1 DANIELLE G2 RAYMOND         | SATURDAY SOCIAL IN RECOVERY G1 JENNIFER G2 PRISCILLA |
| 1:00PM - 1:30PM   | DETOX GROUP G2 JENNIFER                  |   | DETOX GROUP YOGA WITH ISABEL                    | DETOX GROUP G2 DANIELLE              |                             | DETOX GROUP G2 RAYMOND                        |  |
| 1:45PM - 2:30PM   | PATH TO PEACE G1 SARAH G2 LENNA          | UNITED PERSPECTIVES G1 MERVE G2 CLINTON   | CREATIVE EXPRESSION RITA                        | BEYOND THE TEARS G1 ANNA G2 JI       | MINDFULNESS G1 ISABEL G2 JI | RESILIENCE IN RECOVERY G1 JAMILIX G2 FREDLYNE | ART THERAPY JI                                       |
| 2:45PM - 3:30PM   | SUNDAY UPLIFT FRANTZ                     | STRENGTH IN STABILITY G1 JENNIFER G2 ANNA | TRIUMPH OVER TRAUMA G1 MERVE G2 DANIELLE        | STEPS TO SERENITY G1 DAVID G2 DAMAIN | COTI PEER SERVICES WORKSHOP | BRACELET CEREMONY JI & PRISCILLA              | MEN'S JEWELRY WORKSHOP FRANTZ                        |
| 3:45PM - 4:45PM   | RECREATION/ FITNESS                      | THERAPEUTIC REC RITA                      | YOGA ISABEL                                     | RECREATION / FITNESS                 | THERAPEUTIC REC RITA        | ADL / PERSONAL TIME                           | RECREATION / FITNESS                                 |
| 7:00PM-7:45M      | AA MEETING                               | POSITIVE THINKING AMANDA                  | MAKING AMMENDS HENRY                            | NA MEETING                           | SELF-CARE KIM               | MEN'S GROUP SYLVESTER                         | SOBER LIVING KLONETE                                 |

Cut off their Ankle Monitors @ Subpoint... Staff don't even show up to work!

PATRICK GUILLORY, ROOM  
Surfpoint Recovery 327-B  
2316 SURF AVENUE  
Brooklyn, N.Y.  
11224



W.S.C.

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100 Federal Plaza  
Central Islip, N.Y.  
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